

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TARGET CORP., *et al.*,

Plaintiffs,

v.

VISA INC., *et al.*,

Defendants.

7-ELEVEN, INC., *et al.*,

Plaintiffs,

v.

VISA INC., *et al.*,

Defendants.

Case No. 13-cv-3477 (AKH)

Not in granted. Def'ts shall supply, to the court and adverse parties, full documents showing redactions. 8.27.24

Case No. 13-cv-4442 (AKH)

**NOTICE OF MOTION FOR LEAVE TO FILE UNDER SEAL
MATERIALS IN CONNECTION WITH DEFENDANTS' MOTION
FOR A REVISED SUMMARY JUDGMENT RULING UNDER FRCP 54(B)**

PLEASE TAKE NOTICE THAT, pursuant to Rule 4(B)(i) of this Court's Individual Rules, Defendants respectfully move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, in Courtroom 14D of the Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for leave to file under seal unredacted versions of: (i) Memorandum of Law in Support of Defendants' Motion for a Revised Summary Judgment Ruling under Federal Rule of Civil Procedure 54(b) (the "FRCP 54(b) Memorandum of Law"); (ii) Transmittal Declaration of Gary

R. Carney in Support of Defendants' Motion for a Revised Summary Judgment Ruling under Federal Rule of Civil Procedure 54(b) (the "FRCP 54(b) Carney Declaration"); and (iii) certain exhibits attached to the FRCP 54(b) Carney Declaration. Accordingly, pursuant to Rule 4(B)(i) of this Court's Individual Rules, Defendants are contemporaneously herewith (i) filing on ECF partially redacted copies of the FRCP 54(b) Memorandum of Law, the FRCP 54(b) Carney Declaration, and certain exhibits attached to the FRCP 54(b) Carney Declaration, as described in the memorandum of law accompanying and in support of this motion; (ii) filing on ECF placeholders for certain other exhibits attached to the FRCP 54(b) Carney Declaration, as described in the memorandum of law accompanying and in support of this motion; (iii) submitting unredacted copies of the same to the Court; and (iv) serving upon Plaintiffs in the above-captioned actions unredacted copies of the same.

The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: August 21, 2024

Respectfully submitted,

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